

EXHIBIT 64

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In Re: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	
ALL PARTS	:	Case No.: 12-MD-02311
THIS RELATES TO: ALL CASES	:	Honorable Marianne O. Battani
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**DECLARATION OF R. CURTIS ALLEN IN SUPPORT OF SUBARU LEASING
CORP.'S OPPOSITION TO MOTION TO COMPEL**

I, R. Curtis Allen, hereby declare under penalty of perjury as follows:

1. I am the Secretary and Treasurer of Subaru Leasing Corp. ("SLC"). SLC, a wholly-owned subsidiary of Subaru of America, Inc., has no employees.
2. I have reviewed the subpoena served on SLC.
3. SLC's business activities are extremely limited: it manages lease agreements with former employees and other internal customers of affiliated Subaru entities. It does not manufacture or assemble Subaru vehicles, nor does it market, distribute, sell or lease Subaru vehicles to the general public or engage in any financing activity related to such vehicles. SLC does not design, select, source, price, acquire or purchase parts or components for new vehicles.
4. As a result, SLC generally is not in possession of the kind of documents sought by the subpoena, and conducting the kind of search demanded by the subpoena in order to confirm that fact would present an extraordinary burden on SLC, particularly given the lack of any dedicated SLC employees.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18 day of February, 2016 at Cherry Hill, NJ.

